

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NICHOLAS J. WRIGHT, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

RISTORANTE LA BUCA INC., d/b/a  
RISTORANTE LA BUCA; JEANIE  
GIULIANI; ANTHONY GIULIANI;  
and DOE DEFENDANTS 1-10,

Defendant(s).

Civil Action No.: 2:18-cv-02207-MAK

**PLAINTIFF'S PROPOSED VERDICT SHEET**

1. Do you find, by a preponderance of the evidence, that Nicholas J. Wright, Derek Leap, and Matthew Rajczyk worked as "tipped employees" at Ristorante La Buca?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If you answered "YES" to question #1, please proceed to question #2. If you answered "NO" to question #1, please proceed to #10.*

**Liability as to Individual Defendants**

2. Do you find, by a preponderance of the evidence, that Jeanie Giuliani was Plaintiffs Nicholas J. Wright, Derek Leap, and Matthew Rajczyk's "employer" for purposes of the FLSA?

YES \_\_\_\_\_

NO \_\_\_\_\_

3. Do you find, by a preponderance of the evidence, that Anthony Giuliani was Plaintiffs Nicholas J. Wright, Derek Leap, and Matthew Rajczyk's "employer" for purposes of the FLSA?

YES \_\_\_\_\_

NO \_\_\_\_\_

**Damages for Nicholas J. Wright**

4. What sum of money would fairly and reasonably compensate Nicholas J. Wright for the damages, if any, you have found one or more Defendants caused him regarding Wright's minimum wage claims for the time period May 25, 2015 through May 25, 2018?

\$ \_\_\_\_\_

**Willful violation of the FLSA**

5. Do you find, by a preponderance of the evidence, that one or more Defendants knew or showed reckless disregard for the fact that their conduct of not paying Plaintiffs Nicholas J. Wright, Derek Leap, and Matthew Rajczyk the applicable minimum wage rate for each hour worked was forbidden by the FLSA?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If you answered "YES" to question #5, please proceed to question #6. If you answered "NO" to question #5, please proceed to question #8.*

**Damages for Collective Class Members**

6. What sum of money would fairly and reasonably compensate Derek Leap for the damages, if any, you have found one or more Defendants caused him regarding Leap's minimum wage claims under the FLSA for the time period December 12, 2015 through May 25, 2018?

\$ \_\_\_\_\_

7. What sum of money would fairly and reasonably compensate Matthew Rajczyk for the damages, if any, you have found one or more Defendants caused him regarding Rajczyk's minimum wage claims under the FLSA for the time period March 4, 2015 through May 25, 2018?

\$ \_\_\_\_\_

*Please proceed to question #10.*

8. What sum of money would fairly and reasonably compensate Derek Leap for the damages, if any, you have found one or more Defendants caused him regarding Leap's minimum wage claims under the FLSA for the time period December 12, 2016 through May 25, 2018?

\$ \_\_\_\_\_

9. What sum of money would fairly and reasonably compensate Matthew Rajczyk for the damages, if any, you have found one or more Defendants caused him regarding Rajczyk's minimum wage claims under the FLSA for the time period March 4, 2017 through May 25, 2018?

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*Please proceed to question #10.*

10. The Presiding Juror must sign and date this Verdict Sheet. Then the jurors should return to the courtroom.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Presiding Juror